

COHEN & GREEN

June 30, 2023

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case above. As directed by the Court (Dkt. No. 43), I write jointly with counsel for Defendants to provide a monthly status report.

As the Court likely recalls, last month, the Court held a status and discovery conference. As discussed at that conference, Plaintiff amended the complaint to name the individual John and Jane Doe Defendants.¹ *See* ECF No. 90. Defendants have sought and received Plaintiff's consent to a number of extensions of time to serve their amended discovery responses (*see* ECF No. 84), and expect to serve those responses on July 7, 2023.

Plaintiff has also now named and received a summons for the newly named John and Jane Doe Defendants, and will serve them shortly, after which the Law Department will need to move through its ordinary process for conflicts and representation before those Defendants can answer (or otherwise respond to the complaint).

Outside of these issues, the status of the case remains the same as it was in the last status report.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

¹ John or Jane Doe No. 10, defined in the complaint as "the person (or persons) with final say and decision-making authority in enacting the City-wide ban on recording in police stations in 2018" (ECF No. 90 ¶ 20) remains unidentified, as identifying them more cleanly fits in the stayed *Monell* discovery. The relevant statute of limitations for that Doe runs in December, so Plaintiff will address that issue following a decision on the motion to dismiss, or as that date approaches, depending on timing.



COHEN&GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by electronic filing.